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In Pro Per

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES

TODD MICHAEL SCHULTZ

v.

MICHAEL C. THOMPSON
GREGORY R. HOLMES
YOUTUBE LLC

2:23-CV-03452-JAK-MRWx
Honorable Judge John A. Kronstadt

MOTION FOR LEAVE
TO FILE FOR
JUDICIAL NOTICE

To All Parties and Attorneys of Record:

Plaintiff, Todd Michael Schultz, acting in a pro se capacity and pursuant to California Rules of Court, rule 3.400 (a) - A "complex case" is an action that requires exceptional judicial management to avoid placing unnecessary burdens on the court or the litigants and to expedite the case, keep costs reasonable, and promote effective decision making by the court, the parties, and counsel - file this motion for leave to request Judicial Notice concurrently with previously filed REQUEST FOR JUDICIAL NOTICE - and seek to employ Evidence Code sections 452 (h), 453 (b) 454 (a) in requesting this Court take judicial notice of video evidence of Mr. Thompson's behavior, actions and his own words.

1 Plaintiff believes this will clarify the case before the court for the Judges
2 and the Jury. Thompson is cruel, mean and seeks to harass Plaintiff
3 overtly and unmistakably. Said video content will be provided upon an
4 ORDER granting LEAVE for Plaintiff to file for Judicial Notice.
5 Additionally, such content will demonstrate Youtube LLC (onward "
6 Youtube") failure to apply good faith in moderation of taking down
7 such harassing content. Plaintiff alleges Youtube cannot employ §230
8 for immunity if they cannot prove that allegations of lack of "good faith"
9 moderation occurred. They must therefore, prove that they employed
10 such "good faith" in order to be granted a motion to dismiss on the basis
11 of §230 according to Plaintiff's interpretation of said statute.
12 Additionally, Plaintiff, in a pro se capacity, is applying the law to the
13 best of his abilities and humbly requests that the court order
14 modifications of documents where they might succeed - and where they
15 might affect the outcome of this matter - due to improper designation
16 of rules or codes.

17 Dated:
18 Sunday, July 16th,
19 2023

20 Signed by
21 Todd Michael Schultz
22 (Plaintiff)
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